

REMARKS

In response to Examiner's rejection of pending claims 1-20, Applicant respectfully asks Examiner for reconsideration of the application and pending claims 1-20 based on the following remarks.

Claim Rejections – 35 U.S.C. § 101

The Examiner has rejected claims 1-6 under 35 U.S.C §101 because the claimed invention is directed to non-statutory subject matter. Applicant had previously canceled claim 4. Applicant has amended claims 1-3, 5, and 6 to reflect the examiner's suggestion to overcome the 35 U.S.C §101 rejection of these claims. Thus, Applicant respectfully requests withdrawal of the 35 U.S.C. 101 rejection of claims 1-3, 5, and 6.

Claim Rejections – 35 U.S.C. § 102

The Examiner has rejected claims 1-5, 7-11, and 14-18 under 35 U.S.C §102(b), as being anticipated by U.S. Patent No. 5,829,053 to Smith et al. ("Smith"). Applicant had previously canceled claims 4, 10, and 17. For the reasons set forth below, Applicant asserts that the cited reference fails to anticipate Applicant's invention as claimed in claims 1-3, 5, 7-9, 11, 14-16, and 18.

Smith discloses a "memory management method and system incorporating partitioned storage devices having separate partition managers and device drivers." (Smith, column 3, lines 44-47) The system in Smith includes a "store in a block storage memory system." (Smith, column 4, lines 20-21) "A store is a linearly addressable set of

blocks of data contained in the memory of the computer system...” (Smith, column 4, lines 21-23). Additionally, the system in Smith has a mapping which “defines the blocks of data that a store will return when the store is asked for block x.” (Smith, column 4, lines 35-36) Furthermore, the system in Smith defines the mapping by a mapping plug-in, “[t]he mapping of logical blocks to physical blocks in a physical store is defined by its associated mapping plug-in.” (Smith, column 4, lines 36-38) Finally, Smith likens the plug-in as a device driver by stating “[t]he physical store mapping plug-in preferably functions as a device driver for the associated physical storage device, and translates block requests into operations on the physical device.” (Smith, column 4, lines 47-50)

With respect to independent claim 1 in the presently claimed invention, Applicant teaches and claims:

“A computer-implemented method comprising identifying a device by a unique identifier stored within the device, obtaining the unique identifier from the device, and using the unique identifier in conjunction with a mapping table, wherein the mapping table contains at least a column containing a plurality of unique identifiers of devices coupled to a column containing a plurality of updateable addresses of one or more drivers specific to each device, to obtain an address of one or more drivers a driver for the device, and one or more columns that include additional information specifying a version of the driver to be utilized for the device.” (Claim 1) (Emphasis added)

Applicant's method teaches of additional information stored in the mapping table. The additional information relates to the specific version of the driver to be used for operating the device. A device can have multiple driver versions that are present within a system, this additional information allows for a version determination to be made by information residing in the mapping table.

The system and method in Smith do not teach any additional information stored within a mapping table relating to a determination of which version of device driver would be utilized. Thus, Applicant's method is at least distinct from Smith in regard to the additional information column storing driver version information. Thus, because Smith does not teach the presently claimed invention, Applicant respectfully submits that Smith does not anticipate claim 1.

Claims 2, 3, and 5 are dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that Smith does not anticipate claims 2, 3, and 5.

In regard to independent claims 7 and 14, Smith does not anticipate Applicant's invention for the same reason as independent claim 1. Again, the system and method in Smith do not teach any additional information stored within a mapping table relating to a determination of which version of device driver would be utilized. Thus, because Smith does not teach the presently claimed invention, Applicant respectfully submits that Smith does not anticipate claims 7 and 14.

Furthermore, claims 8, 9, and 11 are dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Smith does not anticipate claims 8, 9, and 11.

Additionally, claims 15, 16, and 18 are dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Smith does not anticipate claims 15, 16, and 18.

As such, Smith does not teach or anticipate Applicant's invention as claimed in pending claims 1-3, 5, 7-9, 11, 14-16, and 18. Applicant respectfully requests withdrawal of the 35 U.S.C. 102(b) rejection of claims 1-3, 5, 7-9, 11, 14-16, and 18.

Claim Rejections – 35 U.S.C. § 103

The Examiner has rejected claims 13 and 20 under 35 U.S.C §103(a) as being unpatentable over U.S. Patent No. 5,829,053 to Smith et al. ("Smith"). For the same reasons set forth above in regard to Smith in view of the response to the 35 U.S.C §102(b) rejection, Applicant asserts that the cited reference fails to teach, suggest, or render obvious Applicant's invention as claimed in claims 13 and 20.

Claim 13 is dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Smith does not render this dependent claim obvious.

Claim 20 is dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Smith does not render this dependent claim obvious.

Thus, Smith does not teach, suggest, or render obvious Applicant's invention as claimed in pending claims 13 and 20. Applicant respectfully requests withdrawal of the 35 U.S.C. 103(a) rejection of claims 13 and 20.

The Examiner has rejected claims 6, 12, and 19 under 35 U.S.C §103(a) as being unpatentable over U.S. Patent No. 5,829,053 to Smith et al. (“Smith”) in view of Internet Engineering Task Force (“Task Force”), Simple Service Discovery Protocol/1.0, Operating without an Arbiter, October 29, 1999. For the same reasons set forth above in regard to Smith in view of the response to the 35 U.S.C §102(b) rejection, Applicant asserts that the cited references, taken each alone or in combination, fail to teach, suggest, or render obvious Applicant’s invention as claimed in claims 6, 12, and 19.

Claim 6 is dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that Smith and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 12 is dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Smith and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 19 is dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Smith and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Thus, Smith and Task Force do not teach, suggest, or render obvious Applicant’s invention as claimed in pending claims 6, 12, and 19. Applicant respectfully requests withdrawal of the 35 U.S.C. 103(a) rejection of claims 6, 12, and 19.

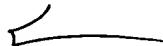
If there are any additional charges, please charge Deposit Account No 02-2666.

If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Michael J. Mallie at (408) 720-8300.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Date: 10/31/05



Michael J. Mallie (Reg. No. 36,591)

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1026
(408) 720-8300

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